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CONESTOGA-ROVERS & ASSOCIATES

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A2
6/7/96

June 7, 1996

Reference No. 3481

Ms. Sheri Bianchin
UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY (USEPA)
Region V (HSRL-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590



Dear Ms. Bianchin:

Re: ACS Schedule

We recently reviewed the current ACS Site project status in relation to our goal of completing installation of the PGCS, and Barrier Wall and completing performance of the predesign Pilot Studies and development of the monitoring programs this year. As you are aware, the end of 1996 or early 1997 has been the group's proposed completion date for these activities for some months. Also, as you are aware, that date is an ambitious one, requiring expedited and cooperative efforts on both our parts if it is to be met. Based on our review of the current situation, we believe that the date these target deadlines are still achievable, but are at risk if certain critical elements are not finalized in accordance with prior Agency commitments. With this letter, we are identifying certain of the most critical elements, so that USEPA and IDEM focus their attention on review and approvals in these areas.

On April 15, 1996, USEPA issued a letter outlining a schedule for completion of various activities, many of which are key to our ability to meet our December 31st date. That April letter reflected timing commitments we had previously indicated to the USEPA were vital to our overall schedule. In reviewing the current status of essential activities and the need for timely attention, we reference the review/approval timing commitments made by USEPA in its April scheduling letter.

1. Upper Aquifer Studies - The actual upper aquifer work was completed in accordance with the approved Work Plan in March 1996 and the original Upper Aquifer Technical Memorandum was submitted on March 18, 1996. In response to comments received on April 19, 1996, a revised Technical Memorandum was submitted on May 6, 1996. It is noted that revised Technical Memorandum which is now under USEPA/IDEM review. Given the length of time which has passed, it appears that the target dates identified in the April 15th letter cannot be met.

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Table 1 summarizes the deadlines and previous target dates which may no longer be met. We need to agree upon a revised schedule for those dates.

2. Lower Aquifer Studies - Again, the actual lower aquifer work was completed in accordance with the approved Work Plan during April and the Technical Memorandum was submitted on schedule by May 3, 1996 and is currently under your review. According to the April 15, 1996 letter, we have 45 days from the approval of that Technical Memo to install any additional Lower Aquifer wells. USEPA targeted July 31, 1996 as the date to complete Task 8B. This means that USEPA must provide approval of the Lower Aquifer Technical Memo by June 17, 1996 in order to meet the Lower Aquifer target dates.
3. PGCS Construction - The 50% Design for the PGCS was submitted to USEPA and is currently under your review. On April 10, 1996, we received approval to begin construction of the PGCS while USEPA review of the Design is ongoing. However, your April 10, 1996 letter states that the construction of the PGCS must be completed by December 31, 1996. We regard this date as a target date which we would like to meet. However, our ability to do so is dependent on receiving timely comments on the Design submittals. In order to meet the December 31, 1996 deadline, we needed comments on the 50% Design by May 31, 1996. We also will require timely comments on any subsequent design submittals.
4. Barrier Wall - The Barrier Wall Technical Memo was submitted to USEPA on April 1, 1996. We have not yet received comments on the Technical Memo, but have received a letter approving the alignment. In order that the barrier wall be installed by February 28, 1997, we require comments on the Barrier Wall Technical Memo as soon as possible and subsequent timely comments on the Design documents for the barrier wall.
5. Pilot Studies - On April 15, 1996, we submitted revisions to Section 5 - Pilot/Treatability Studies which is currently under your review. It is our hope that the pilot studies can be conducted in 1996. Hence, we require your timely review and approval of the Work Plan in order to reach that goal. Approval must be received by June 15, 1996 in order for us to complete the pilot studies under the proposed schedule.

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We emphasize that our group continues to be committed to expediting the above described response activities as we originally volunteered. However, we are concerned that we may be unable to do so if we all do not refocus our attentions on that larger goal and on meeting essential interim schedules. If you have any questions, please feel free to contact us. We look forward to discussing these matters with you during our June 12th meeting.

Sincerely,

CONESTOGA-ROVERS & ASSOCIATES



Ronald Frehner

RF/br

Enc.

c.c. Holly Grejda; IDEM
Steve Mrkvicka; Black & Veatch
ACS Technical Committee

TABLE 1

**SUMMARY OF UPCOMING TASKS
UPPER AND LOWER AQUIFER STUDIES**

| <i>Task</i> | <i>Description</i> | <i>Deadline</i> | <i>USEPA Target Date</i> |
|----------------------|--|--|---------------------------------------|
| <u>Upper Aquifer</u> | | | |
| 8a | - Install Upper Aquifer wells | - Within 45 days after approval of Upper Aquifer Technical | 6/15/96 |
| 9a | - Sample Upper Aquifer wells, prepare report and propose monitoring program | - Within 60 days after completion of 8a | 8/15/96 |
| 10a | - Perform quarterly sampling in Upper Aquifer and submit | - After USEPA approval of 9a (no time-frame specified) | Sample by 8/96 Report by 10/31/96 |
| <u>Lower Aquifer</u> | | | |
| 8b | - Install additional wells | - Within 45 days after approval of Lower Aquifer Technical | 7/31/96 |
| 9b | - Sample Lower Aquifer wells and submit report, and propose quarterly monitoring program | - Within 60 days after completion of 8b | 9/30/96 |
| 10b | - Perform quarterly sampling in Lower Aquifer and submit | - After approval of 9b (no time-frame specified) | Sample by 10/96 Report by 12/31/96 |